

EXHIBIT L

Date	Hours	Attorney/Paralegal	Description
1/12/2023	3.7	John Grzybek	Review and analysis of case law; revising and drafting complaint.
1/13/2023	3.1	John Grzybek	Drafting of complaint; factual research on PLAM.
1/13/2023	1.8	John Grzybek	Drafting of complaint; factual research on PLAM. Revisions.
1/16/2023	6.1	John Grzybek	Revisions to and drafting of complaint.
1/17/2023	1.7	John Grzybek	Drafting claims; revising factual allegations.
1/17/2023	0.8	John Grzybek	Revisions and drafting of claims; cite checking; legal research and analysis of results
1/18/2023	0.2	John Grzybek	Communications via email; review of photos; additional requests for factual information relevant to complaint allegations
1/18/2023	3.8	John Grzybek	Drafting and revising claims to complaint; legal research assembly; freedom of religion legal issues and factual re: allegations.
1/23/2023	3.7	John Grzybek	Drafting and revising complaint.
1/23/2023	0.4	John Grzybek	Conferred with EK; complaint claims; association arguments.
1/24/2023	5.8	John Grzybek	Legal research and analysis; re: first amendment solicitation issues.
1/25/2023	0.7	John Grzybek	Legal research and analysis: re: solicitation and first amendment; applicability to claims related to free speech.
1/25/2023	0.8	John Grzybek	Conferred with EK re: oral argument issues.
1/27/2023	4.3	John Grzybek	Revising and drafting claims; legal research and analysis.
2/1/2023	1.9	John Grzybek	Revising and drafting complaint.
2/2/2023	0.2	John Grzybek	Conferred with EK: legal issues regarding "physical disruption."
2/2/2023	2.0	John Grzybek	Drafting and revising complaint; legal research and analysis.
2/3/2023	1.2	John Grzybek	Drafting and revising complaint; legal research and analysis.
2/3/2023	6.5	John Grzybek	Drafting and revising complaint. Legal research and analysis, including applicable federal case law re: vagueness and overbreadth
2/6/2023	4.5	Erick Kaardal	Draft and revise PLAM complaint against Minneapolis ordinance.
2/6/2023	8.5	John Grzybek	Revising and drafting complaint and claims. Legal research and analysis re: free exercise; assembly; association; genuinely held religious beliefs.
2/13/2023	3.5	John Grzybek	Preparation for meeting; review of exhibits. Meeting with clients; review of complaint; factual corrections.
4/14/2023	0.2	Joan Mannix	Review order dismissing complaint w/o prejudice
4/15/2023	0.2	Peter Breen	Review dismissal order, corregardingspondence with cocounsel regarding same
4/17/2023	2.7	Tyler Brooks	Review and Analyze Minneapolis Ordinance, Original Complaint, and Court's Order Sua Sponte Dismissing Same

4/19/2023	0.4	Peter Breen	Attend teleconference with cocounsel & clients regarding recrafting claims for amended complaint
4/19/2023	0.5	Tyler Brooks	Prepare for and Attend Conference Call with Clients, Peter Breen, and Erick Kaardal re: Strategy and Refiling of Complaint
5/13/2023	0.5	Peter Breen	Review Tyler Brooks' significant edits to amended complaint; correspondence with Mr. Kaardal & with Mr. Brooks regarding edits
5/13/2023	7.8	Tyler Brooks	Perform Extensive Editing and Redrafting of Amended Complaint, in Accord with Court's Order Requiring Same
5/13/2023	0.4	Tyler Brooks	Email Peter Breen and Michael McHale re: Revisions to Amended Complaint
5/23/2023	0.8	Peter Breen	Conf with Tyler Brooks regarding case strategy
5/23/2023	0.8	Tyler Brooks	Call with Peter Breen re: Defense and Allegations of Amended Complaint
6/21/2023	0.2	Peter Breen	Corr with Tyler Brooks regarding preparing PHV motions to enter case
6/26/2023	0.5	Peter Breen	Prep PHV motion in compliance with review rules regarding same
6/26/2023	1.2	Tyler Brooks	Prepare and Email to Local Counsel Motion for Admission Pro Hac Vice in Accordance with Rules and Procedures re: Same
6/27/2023	0.4	Tyler Brooks	File Motion for PHV Admission of BTB
7/6/2023	5.6	Tyler Brooks	Review and Analyze Arguments of City in Motion to Dismiss; Prepare Outline of Response
7/7/2023	3.7	Tyler Brooks	Work on Response in Opposition to Motion to Dismiss
7/9/2023	10.5	Tyler Brooks	Continue Work on Response in Opposition to Motion to Dismiss - Focus on Issues re: Legislative Record
7/10/2023	1.0	Peter Breen	Review MTD in prep for conference with Tyler Brooks regarding MTD Response issues and arguments
7/10/2023	2.8	Tyler Brooks	Work on Issue re: Potential Conversation to Rule 56
7/10/2023	2.2	Tyler Brooks	Prepare Declaration of Counsel for Response Memorandum
7/10/2023	0.4	Tyler Brooks	Telephone Conference with Peter Breen re: Arguments on Motion to Dismiss
7/24/2023	0.2	Tyler Brooks	Receive and Review Order re: Resetting of Hearing on Motion to Dismiss; Arrange Plans re: Same
7/24/2023	3.6	Tyler Brooks	Review and Analyze City's Reply in Support of Motion to Dismiss and Chart Points for Arguments for Hearing
7/31/2023	0.5	Peter Breen	Review City's Reply to MTD
8/23/2023	3.7	Tyler Brooks	Review Further Motion to Dismiss Filings and Prepare Outline of Argument for Motion to Dismiss Hearing

9/6/2023	0.1	Tyler Brooks	Receive and Review Order Resetting Hearing on Motion to Dismiss
9/11/2023	0.2	Tyler Brooks	Receive and Review Order of Recusal, Notice of Cancellation, and Notice of Resetting
10/10/2023	0.5	Tyler Brooks	Call with Peter Breen re: Strategy for Motion to Dismiss Hearing
10/11/2023	0.5	Peter Breen	Prep & correspondence regarding MTD hearing
10/11/2023	0.6	Tyler Brooks	Follow Up Call with Peter Breen re: Legal Analysis of Arguments for Motion to Dismiss Hearing
10/12/2023	0.2	Peter Breen	Corr with Tyler Brooks regarding hearing, prep for hearing
10/13/2023	0.2	Peter Breen	Conf with Tyler Brooks regarding argument
10/13/2023	0.7	Peter Breen	Review and analyze applicable case law in preparation for MTD argument
10/13/2023	0.2	Tyler Brooks	Calls with Peter Breen re: Motion to Dismiss Hearing
10/15/2023	3.5	Michael McHale	Review Am. Cmplt., party briefing on MTD, city council transcript re: buffer zone law
10/15/2023	1.4	Michael McHale	Review briefing in our similar Westchester and Clearwater cases, and relevant caselaw
10/15/2023	1.1	Michael McHale	Craft arguments for p.b. for MTD hearing
10/15/2023	5.8	Peter Breen	Prepare regarding for MTD argument, review filings & key cases; correspondence with clients regarding current situation at Minneapolis PP & past incidents at Minneapolis PP, conference with Thomas Wilkins regarding same, review incident reports from clients; correspondence with cocounsel regarding legislative record, incl statements of sponsor at passage of ordinance, videos presented to Council at passage, review of same
10/16/2023	2.3	Elizabeth Nielsen	Travel to motion to dismiss hearing and preparation for motion to dismiss hearing; Hearing from 9am-10am; return from hearing.
10/16/2023	0.3	Elizabeth Nielsen	Consultation with Co-Counsel regarding hearing.
10/16/2023	5.0	Peter Breen	Further prep for MTD hearing, attend & argue hearing
10/16/2023	2.7	Peter Breen	Conf with clients about key facts of case, potential discovery requests, volume and nature regarding of discoverable materials, conference with cocounsel regarding same
10/17/2023	0.3	Peter Breen	Conf with Tyler Brooks regarding argument
10/17/2023	0.3	Tyler Brooks	Post-Hearing Telephone Call with Peter Breen re: Oral Argument
10/30/2023	0.8	Michael McHale	Review order denying City's MTD, email response thoughts to co-counsel

10/30/2023	0.7	Tyler Brooks	Review and Analyze Court's Order on Motion to Dismiss
10/30/2023	0.2	Tyler Brooks	Respond to Email from Client Debra Braun re: Order
10/31/2023	0.2	Elizabeth Nielsen	Reviewing PLAM memo and order.
10/31/2023	1.6	Michael McHale	Research law on motion for judgment on the pleadings
10/31/2023	0.4	Peter Breen	Review pretrial order, correspondence with cocounsel regarding same
10/31/2023	0.5	Tyler Brooks	Review and Analyze Court's Order Setting Pretrial Conference and Attachments
10/31/2023	0.3	Tyler Brooks	Exchange Email Correspondence with Peter Breen re: ESI Protocols and Plan
11/1/2023	0.5	Michael McHale	Email pb with research and argument re: motion for judgment on pleadings
11/13/2023	0.4	Peter Breen	Conf with Tyler Brooks regarding case strategy
11/13/2023	0.8	Tyler Brooks	Review and Analyze City's Answer to Amended Complaint
11/13/2023	0.4	Tyler Brooks	Telephone Conference with Peter Breen re: Case Strategy/Case Management
11/16/2023	0.2	Peter Breen	Exchange correspondence with Tyler Brooks regarding Rule 26 conference & client documents needed for disclosures
11/20/2023	0.3	Peter Breen	Corr & conference with Tyler Brooks regarding scheduling Rule 26 conference & disclosures
11/20/2023	0.2	Tyler Brooks	Email Opposing Counsel re: Time for Rule 26(f) Conference
11/20/2023	0.1	Tyler Brooks	Telephone Conference with Peter Breen re: Rule 26(f) Conference
11/21/2023	1.5	Peter Breen	Conf with Tyler Brooks regarding Rule 26 conference, attend Rule 26 conference
11/21/2023	1.1	Tyler Brooks	Telephone Conference with Peter Breen re: Rule 26(f) Conference
11/21/2023	0.2	Tyler Brooks	Exchange Email Correspondence with Opposing Counsel re: Scheduling Rule 26(f) Conference
11/21/2023	0.4	Tyler Brooks	Prepare for and Attend Rule 26(f) Meeting with Opposing Counsel
11/22/2023	0.7	Tyler Brooks	Receive and Review Draft Rule 26(f) Report from City's Counsel; Make Proposed Change; Email City re: Proposed Change; File Final Joint Report
11/27/2023	0.5	Tyler Brooks	Receive and Review Court's Pretrial Scheduling Order
11/30/2023	0.3	Tyler Brooks	Receive and Review Email from Client Debra Braun re: Activity Outside Planned Parenthood
12/13/2023	1.0	Peter Breen	Review draft of initial disclosures, conference with cocounsel regarding same

12/13/2023	2.7	Tyler Brooks	Work on Initial Disclosures; Confer with Clients and Co-Counsel re: Same
12/14/2023	0.2	Peter Breen	Corr with Tyler Brooks regarding initial disclosures
12/14/2023	0.8	Tyler Brooks	Exchange Email Correspondence among Co-Counsel re: Finalizing Initial Disclosures; Finalize and Serve Plaintiffs' Initial Disclosures
12/15/2023	0.9	Tyler Brooks	Review and Analyze City's Initial Disclosures
12/18/2023	5.7	Tyler Brooks	Work on Draft Interrogatories to City
12/19/2023	3.7	Tyler Brooks	Work on Draft Requests for Production of Documents and Revisions to Interrogatories
12/19/2023	4.5	Tyler Brooks	Work on Revisions to Documents Requests; Work on Additional Interrogatories; Edit Same; Email to Peter Breen for Review
12/19/2023	0.5	Tyler Brooks	Telephone Conference with Peter Breen re: Draft Written Discovery Requests
12/21/2023	3.3	Tyler Brooks	Work on Revisions to Draft Interrogatories; Draft Requests for Admissions; Email Peter Breen re: Same
12/28/2023	0.6	Peter Breen	Review draft proposed discovery protocols for ESI etc., conference with Tyler Brooks regarding same
12/28/2023	0.5	Tyler Brooks	Exchange Email Correspondence with Opposing Counsel re: ESI Protocol, Protective Order, and Time Keeping; Follow Up Email re: Initial Disclosures
12/28/2023	0.3	Tyler Brooks	Telephone Conference with Peter Breen re: Discovery Protocols
1/7/2024	4.3	Tyler Brooks	Work on Revisions to Draft Interrogatories, Requests for Documents, and Requests for Admissions
1/8/2024	1.4	Tyler Brooks	Make Additional Revisions to Draft Discovery and Email to Peter Breen for Review
1/21/2024	0.9	Peter Breen	Review draft discovery requests, propose revisions
1/22/2024	3.5	Tyler Brooks	Receive Further Comments from Co-Counsel re: Drafting Proper Scope of Interrogatories; Finalize and Serve Same
1/22/2024	2.4	Tyler Brooks	Add to and Edit Request for Production of Documents to City; Finalize and Serve Same;
2/7/2024	2.3	Tyler Brooks	Receive and Review and Begin Preparing Responses to City's Discovery Requests to Plaintiffs
2/15/2024	1.1	Peter Breen	Review City's discovery requests, correspondence with Tyler Brooks regarding issues with discovery, need for protective order, and client response

2/20/2024	0.3	Peter Breen	Email client regarding City's discovery requests, set video conference regarding requests, documents, and response
2/21/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Client re: Discovery Needs
2/22/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Opposing Counsel to Grant City Extension of Time to Respond to Discovery
2/26/2024	1.5	Tyler Brooks	Receive and Make Initial Review of City's Responses to Plaintiffs' Discovery Requests
2/27/2024	1.1	Peter Breen	Prep for & attend videoconference with client and cocounsel regarding discovery requests and responses
2/27/2024	5.7	Tyler Brooks	Review and Analyze Documents from Clients as Part of Preparing Discovery Responses
2/27/2024	0.8	Tyler Brooks	Confer with Clients re: Responses to Plaintiffs' Discovery
2/28/2024	0.5	Nathan Loyd	Confer with Peter Breen to establish document review plan.
2/28/2024	0.8	Peter Breen	Corr with cocounsel regarding discovery issues, conference with cocounsel regarding same
2/28/2024	0.4	Tyler Brooks	Telephone Conference with Peter Breen re: Plaintiffs' Responses to City's Discovery Requests
2/29/2024	2.1	Nathan Loyd	Review and analyze documents and images provided by City; identify relevant documents; annotate for future arguments and depositions
2/29/2024	0.4	Peter Breen	Corr with clients regarding key items to obtain in discovery & categories of documents available, correspondence with cocounsel approving e-discovery vendor
2/29/2024	3.7	Tyler Brooks	Receive and Review Additional Materials from Clients to Review as Potentially Responsive to Discovery Requests
3/1/2024	2.4	Tyler Brooks	Exchange Email Correspondence with Clients re: Subset of Documents In Conjunction with Reviewing Provided Documents and for Drafting Letter to Clients Explaining Discovery Protocols
3/4/2024	1.4	Nathan Loyd	Work with discovery vendor to setup workspace and protocols in line with parties' ESI protocol and needs of case
3/4/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Nathan Loyd re: Sandline/Everlaw and Compliant Process for Document Management
3/4/2024	0.5	Tyler Brooks	Follow Up Email Exchange with Peter Breen and Nathan Loyd re: Data Extraction
3/5/2024	0.2	Nathan Loyd	Establish discovery processing plan and begin analysis.

3/5/2024	0.2	Tyler Brooks	Telephone Conference with Nathan Loyd re: Discovery Processing and Analysis in Light of Federal Rules Requirements and Discovery Requests
3/7/2024	0.3	Nathan Loyd	Analyze Client documents and instruct ediscovery vendor on upload requirements.
3/7/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Opposing Counsel for Responses to City's Discovery Requests
3/7/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Nathan Loyd re: Sandline/Everlaw Setup for Discovery Review Issues
3/8/2024	0.3	Nathan Loyd	Analyze Client documents and instruct ediscovery vendor on upload requirements.
3/8/2024	0.6	Nathan Loyd	Further work with discovery vendor to ensure workspace set up according to needs of case
3/8/2024	0.2	Tyler Brooks	Call with Nathan Loyd re: Discovery Located in Everlaw
3/11/2024	0.2	Peter Breen	Corr with MGM regarding application of underlying purpose viewpoint discrimination caselaw, including "ag gag" cases, to support speech claims here
3/12/2024	4.2	Nathan Loyd	Review and analyze documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/12/2024	0.1	Nathan Loyd	Analyze Client documents and instruct ediscovery vendor on upload requirements.
3/13/2024	5.7	Nathan Loyd	Continue review and analysis of documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/15/2024	1.5	Tyler Brooks	Call with Client Thomas Wilkin and Co-Counsel Nathan Loyd re: Documents for Plaintiffs' Discovery Responses
3/15/2024	0.2	Tyler Brooks	Call with Nathan Loyd re: Plaintiffs' Documents for Production
3/16/2024	2.3	Nathan Loyd	Continue review and analysis of documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/19/2024	6.5	Tyler Brooks	Work on Objections and Responses to Requests for Production of Documents; Work on Responses and Objections to Interrogatories
3/20/2024	2.2	Nathan Loyd	Review and analyze TB objections to interrogatories; incorporate edits to the same.

3/20/2024	4.6	Tyler Brooks	Continue Work on Objections and Resposes to City's Requests for Production of Documents; Email Same to Nathan Loyd for Review
3/20/2024	2.2	Tyler Brooks	Work on Additional Revisions to Draft Interrogatory Responses and Email Same to Nathan Loyd for Review
3/21/2024	0.0	Nathan Loyd	Review and analyze TB objections to interrogatories; incorporate edits to the same.
3/21/2024	2.8	Nathan Loyd	Continue review and analysis of documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/21/2024	0.2	Peter Breen	Corr with clients & cocounsel regarding meeting to discuss discovery issues
3/21/2024	0.7	Tyler Brooks	Receive and Review Nathan Loyd's Proposed Revisions to Draft Interrogatory Objections and Responses
3/21/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Clients re: Scheduling Meeting to Discuss Discovery
3/22/2024	0.6	Michael McHale	Review, suggest edits to proposed interrogatories
3/22/2024	0.5	Nathan Loyd	Review and analyze TB objections to interrogatories; incorporate edits to the same.
3/22/2024	3.2	Nathan Loyd	Continue review and analysis of documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/22/2024	3.7	Peter Breen	Review of latest interrogatory responses and document requests, propose revisions of same; Extensive conferences with clients to go over their discovery responses and document production, to discuss the City's responses, and to address further discovery issues
3/22/2024	0.5	Tyler Brooks	Conference Call with Peter Breen and Nathan Loyd re: Plaintiffs' Discovery Responses
3/22/2024	2.5	Tyler Brooks	Conference Call with Clients, Peter Breen, and Nathan Loyd re: Discovery Responses
3/22/2024	2.3	Tyler Brooks	Exchange Email Correspondence Conferring with Co-Counsel Michael McHale re: Interrogatory Responses and Work on Revisions to Interrogatory Responses Based on Advise from Mr. McHale
3/22/2024	0.8	Tyler Brooks	Prepare Proposed Stipulation
3/22/2024	2.8	Tyler Brooks	Further and final revisions to Plaintiffs' Objections, Answers, and Responses to City's Interrogatories and Requests for Production of Documents

3/22/2024	0.3	Tyler Brooks	Email Opposing Counsel re: Plaintiffs' Discovery Responses and Proposed Stipulation
3/25/2024	0.2	Elizabeth Nielsen	Confirming 30(b)(6) deposition availability
3/25/2024	0.5	Nathan Loyd	Continue review and analysis of documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/26/2024	0.5	Nathan Loyd	Continue review and analysis of documents and images provided by Client; identify relevant documents; annotate for future arguments; review for privilege claims and responsiveness.
3/26/2024	1.0	Nathan Loyd	Review draft letter from Tyler Brooks on issues with City's discovery responses
3/26/2024	0.5	Peter Breen	Conf with Tyler Brooks regarding meet and confer discovery letter to City
3/26/2024	4.3	Tyler Brooks	Work on Draft Letter to City's Counsel re: Issues with City's Discovery Responses; Send to Nathan Loyd for Review; Receive and Review Nathan Loyd's Comments
3/26/2024	0.5	Tyler Brooks	Telephone Conference with Peter Breen re: Letter to City on Deficiencies in Discovery Responses
3/27/2024	9.1	Nathan Loyd	Review and analyze of documents and images provided by City; identify relevant documents; annotate for future arguments and depositions
3/27/2024	0.4	Tyler Brooks	Receive and Respond to Follow Up Email from Client Debra Braun re: Discovery
3/27/2024	6.7	Tyler Brooks	Work on Topics for Rule 30(b)(6) Notice to the City
3/27/2024	2.0	Tyler Brooks	Work on Edits to Letter to be Sent to City re: Discovery Responses; Send to Peter Breen for Review
3/28/2024	1.9	Nathan Loyd	Continue review and analysis of documents and images provided by City; identify relevant documents; annotate for future arguments and depositions
3/28/2024	0.6	Nathan Loyd	Review and analyze draft 30(b)(6) for Tyler Brooks
3/28/2024	0.6	Tyler Brooks	Receive and Analyze Edits from Nathan Loyd re: Rule 30(b)(6) Notice
3/28/2024	0.2	Tyler Brooks	Telephone Conference with Nathan Loyd re: Materials Produced by City in Discovery
3/29/2024	2.9	Nathan Loyd	Continue review and analysis of documents and images provided by City; identify relevant documents; annotate for future arguments and depositions
3/29/2024	4.7	Tyler Brooks	Review and Analyze Documents for Plaintiffs' Production of Documents

3/29/2024	0.4	Tyler Brooks	Telephone Conference with Nathan Loyd re: Review of Discovery in Everlaw
4/1/2024	2.1	Peter Breen	Significant edits to meet and confer letter, further review & analysis of discovery responses supporting same; email to cocounsel conveying same and raising additional potential issues
4/1/2024	2.0	Peter Breen	Various conference with cocounsel regarding discovery disputes, which to press with opposing counsel, presentation of disputes in letter and potentially to Court
4/1/2024	3.1	Peter Breen	Review of key documents from City's production, correspondence with cocounsel regarding missing documents and completeness of legislative record discovery, regarding critical facts and quotes from key production, regarding need for timeline linked to documents
4/1/2024	2.5	Tyler Brooks	Receive and Review Edits from Peter Breen re: Edits to Letter to City re: Discovery Issues; Respond to Follow Up Questions from Peter Breen
4/1/2024	1.5	Tyler Brooks	Prepare and Serve Supplemental Discovery Production
4/1/2024	1.4	Tyler Brooks	Telephone Conferences with Peter Breen re: Strategy for Discovery Disputes and Letter to Opposing Counsel re: Same
4/2/2024	5.0	Nathan Loyd	Identify key documents in City production detailing timeline of Chapter 405 passage (3); analyze the same (1); draft synopsis of timeline and key communications from City documents on passage (1)
4/2/2024	0.4	Peter Breen	Exchange correspondence with City regarding missing password on their discovery and regarding completeness of discovery after City's latest supplemental production
4/2/2024	0.8	Peter Breen	Further conference with Tyler Brooks regarding discovery dispute and meet & confer letter
4/2/2024	0.3	Peter Breen	Exchange email with client regarding knowledge or evidence of ACLU review of final enacted ordinance
4/2/2024	0.8	Tyler Brooks	Telephone Conference with Peter Breen re: Letter to Opposing Counsel and Demanded Remedy
4/2/2024	0.7	Tyler Brooks	Exchange Email Correspondence with PLAM Representative Brian Gibson re: Specific Discovery Question
4/2/2024	0.8	Tyler Brooks	Telephone Conference with Nathan Loyd re: Discovery Searches in Everlaw; Demonstrating Deficiencies in Claims of Privilege

4/3/2024	2.1	Peter Breen	Review NL's timeline of key documents in City's production; review revised meet & confer letter on deficiencies in production, make substantial further edits to letter; conference with Tyler Brooks regarding same
4/3/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Client Debra Braun with Question re: Discovery Production
4/3/2024	3.6	Tyler Brooks	Confer with Peter Breen, Make Final Edits, and Send to Opposing Counsel Plaintiffs' Letter re: Discovery Issues
4/4/2024	1.1	Nathan Loyd	Review and analyze latest documents and images provided by City; identify relevant documents; annotate for future arguments and depositions
4/4/2024	3.4	Nathan Loyd	Prepare for meet and confer with opposing counsel on interrogatories and RFPs (2); attend meet and confer (.5); review meet and confer with Peter Breen and Tyler Brooks (.9)
4/4/2024	1.7	Peter Breen	Review City's edits to protective order and its email on latest discovery issues, exchange series of emails with cocounsel regarding City's proposed changes to order and alternate counterproposals to address City's concerns, regarding issues with City's latest production reusing prior Bates numbers
4/4/2024	1.5	Peter Breen	Prep for and attend meet & confer, conference with cocounsel afterward regarding next steps on outstanding discovery issues
4/4/2024	2.4	Tyler Brooks	Exchange Email Correspondence with Peter Breen and Nathan Loyd re: Discovery Issues and Protective Order Prior to Meet and Confer with City's Counsel
4/4/2024	0.5	Tyler Brooks	Prepare for and Attend Meet and Confer with Opposing Counsel along with Peter Breen and Nathan Loyd
4/4/2024	0.9	Tyler Brooks	Telephone Conference with Peter Breen re: Meet and Confer and Strategy for Moving Discovery Forward
4/5/2024	1.6	Nathan Loyd	Call with Peter Breen and Tyler Brooks on discovery strategy
4/5/2024	3.7	Nathan Loyd	Draft additional Requests for Production, Interrogatories, and Requests for Admission
4/5/2024	1.6	Peter Breen	Conf with Nathan Loyd & Tyler Brooks & CF regarding discovery strategy, planning to address prior discovery deficiencies, need to serve and nature regarding of add'l discovery requests, deposition issues
4/5/2024	1.8	Tyler Brooks	Work on Follow Up Letter re: Prior Day's Meet and Confer on Discovery Issues

4/5/2024	1.6	Tyler Brooks	Telephone Conferences with Peter Breen, Nathan Loyd and CF re: Discovery Issues with City and Other Matters of Strategy
4/8/2024	1.4	Nathan Loyd	Review and analyze 243 body cam videos responsive to Defendant's discovery requests.
4/8/2024	0.8	Peter Breen	Conf with Tyler Brooks regarding supplemental discovery to City
4/8/2024	4.5	Tyler Brooks	Work on Supplemental Discovery and Supplemental Correspondence to City
4/8/2024	0.8	Tyler Brooks	Telephone Conference with Peter Breen re: Supplemental Discovery Requests to City
4/9/2024	0.6	Peter Breen	Conf with Tyler Brooks regarding outstanding discovery disputes
4/9/2024	0.6	Tyler Brooks	Telephone Conference with Peter Breen re: Strategy for Deposition / Resolving Written Discovery Disputes
4/10/2024	0.6	Nathan Loyd	Review Supplemental Discovery and Supplemental Correspondence to City for Tyler Brooks
4/10/2024	4.7	Nathan Loyd	Continue review and analysis of body cam footage responsive to Defendant's discovery requests.
4/10/2024	0.5	Peter Breen	Conf with Tyler Brooks regarding depositions
4/10/2024	0.3	Tyler Brooks	Exchange Email Correspondence with Local Counsel re: Deposition Availability and Scheduling
4/10/2024	3.5	Tyler Brooks	Review and Analyze City's Document Production and Discovery Responses
4/10/2024	0.5	Tyler Brooks	Telephone Conference with Peter Breen re: Correspondence on Deposition Availability
4/11/2024	7.7	Nathan Loyd	Continue review and analysis of body cam footage responsive to Defendant's discovery requests; email full notes on body cam footage, brief additional thoughts, and certain videos for further review to Peter Breen and Tyler Brooks.
4/15/2024	2.0	Nathan Loyd	Continue review of 299k emails from clients' server for responsive and privileged information
4/15/2024	0.4	Peter Breen	Conf with Tyler Brooks regarding obtaining service on subpoena respondents
4/15/2024	0.4	Tyler Brooks	Telephone Conference with Peter Breen re: Service of Deposition Subpoenas on Third Party Witnesses
4/16/2024	0.5	Nathan Loyd	Continue review of 299k emails from clients' server for responsive and privileged information

4/16/2024	0.7	Nathan Loyd	Call with Peter Breen and Tyler Brooks on subpoenas and lingering discovery.
4/16/2024	0.7	Peter Breen	Conf with Nathan Loyd & Tyler Brooks regarding discovery issues & subpoenas
4/16/2024	0.4	Tyler Brooks	Email City's Counsel re: Proposed Discovery Stipulation (Protective Order)
4/16/2024	0.7	Tyler Brooks	Conference with Peter Breen and Nathan Loyd re: Subpoenas
4/17/2024	0.2	Tyler Brooks	Email Local Counsel re: Local Requirements for Proper Service of Subpoenas
4/18/2024	0.4	Peter Breen	Conf with Tyler Brooks regarding discovery issues
4/18/2024	0.4	Tyler Brooks	Telephone Conference with Peter Breen re: Discovery Scheduling and Possible Amendments to Schedule
4/19/2024	1.1	Peter Breen	Conf with Tyler Brooks regarding City discovery deficiencies, need for meet & confer and supporting letter contents, deposition issues
4/19/2024	1.1	Tyler Brooks	Telephone Conference with Peter Breen re: Brief on Comprehensive Issues with Discovery Deficiencies in City's Responses and Strategies
4/22/2024	0.3	Tyler Brooks	Telephone Conference with Co-Counsel Nathan Loyd re: City's Discovery Productions
4/24/2024	0.4	Tyler Brooks	Exchange Email Correspondence with Elizabeth Neilsen re: Deposition Issues
4/25/2024	0.4	Nathan Loyd	Call with Peter Breen and Tyler Brooks regarding City's notices of deposition for plaintiffs
4/25/2024	0.7	Peter Breen	Conf with cocounsel regarding discovery issues, City's deficiencies, deposition scheduling & staffing
4/25/2024	0.3	Tyler Brooks	Review and Analyze Stipulation and Protective Order
4/25/2024	0.7	Tyler Brooks	Telephone Conference with Peter Breen re: Letter to City's Counsel on Discovery Problems
4/26/2024	0.3	Peter Breen	Review draft meet & confer letter on discovery deficiencies & deposition scheduling, conference with Tyler Brooks regarding same
4/26/2024	0.4	Tyler Brooks	Revise Draft Letter to the City's Counsel and Confer with Peter Breen re: Same
4/26/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Opposing Counsel re: Scheduling Depositions
4/26/2024	0.9	Tyler Brooks	Exchange Email Correspondence with Client Lucy Maloney re: Deposition/Discovery

4/29/2024	0.3	Nathan Loyd	Meet and confer for deposition scheduling
4/29/2024	1.2	Peter Breen	Conf with Tyler Brooks regarding discovery issues, meet & confer strategy, deposition spacing & ordering
4/29/2024	0.4	Tyler Brooks	Conference with City's Counsel on Deposition Scheduling and discovery issues
4/29/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Local Counsel re: Availability for Depositions
4/29/2024	1.2	Tyler Brooks	Telephone Conference with Peter Breen re: Discovery, Issues to Raise with Opposing Counsel, and Deposition Strategy
4/29/2024	0.4	Tyler Brooks	Telephone Conference with Nathan Loyd re: Discovery Arrangement and Analysis in Everlaw
4/30/2024	0.3	Peter Breen	Conf with Tyler Brooks regarding deposition meet & confer and next steps
4/30/2024	0.3	Tyler Brooks	Telephone Conference with Peter Breen re: Depositions
4/30/2024	0.2	Tyler Brooks	Exchange Email Correspondence with City's Counsel re: Scheduling of PLAM's 30(b)(6) Deposition; Receive and Review City's Amended Notices
5/2/2024	1.2	Elizabeth Nielsen	Communications re: pro hac vice motions; preparing motion; filing pro hac vice motion.
5/2/2024	0.9	Nathan Loyd	Call with Peter Breen and Tyler Brooks regarding motion to compel production and remaining discovery
5/2/2024	1.0	Nathan Loyd	Review communications with City and Planned Parenthood with Tyler Brooks regarding discovery and depositions; determine plan to address remaining discovery
5/2/2024	3.4	Nathan Loyd	Proof and finalize Plaintiffs' production of videos, training items, newsletters, schedules for production; ensure documents are responsive and nonprivileged.
5/2/2024	1.0	Peter Breen	Conf with cocounsel regarding outstanding discovery disputes, status of review and expected additional production
5/2/2024	0.4	Peter Breen	Review correspondence from Planned Parenthood counsel urging depositions may be taken after discovery deadline, exchange correspondence with Mr. Kaardal regarding local practice on late depositions

5/2/2024	1.5	Peter Breen	Draft proposed email response to City regarding Planned Parenthood's and City's refusal to timely produce witnesses; revise meet & confer letter on City's deficiencies, discovery disputes, and meeting discovery cutoff
5/2/2024	0.7	Tyler Brooks	Revise Draft Letter to City re: Discovery Dispute; Finalize and Send Letter to Opposing Counsel
5/2/2024	0.9	Tyler Brooks	Telephone Conferences with Peter Breen re: Letter to Opposing Counsel re: Dispute
5/2/2024	0.8	Tyler Brooks	Telephone Conference with Nathan Loyd re: Analysis of Discovery and Findings
5/3/2024	0.5	Elizabeth Nielsen	Communications re: pro hac vice motion for Joan Mannix
5/3/2024	0.6	Peter Breen	Review City's discovery letter, conference with Tyler Brooks regarding same
5/3/2024	0.8	Tyler Brooks	Receive and Review Response of City to Plaintiffs' 5/2/24 Letter re: Discovery
5/3/2024	0.3	Tyler Brooks	Telephone Conference with Peter Breen re: Letter to City's Counsel on Discovery Concerns
5/5/2024	0.2	Peter Breen	Corr with Planned Parenthood regarding scheduling meet & confer
5/5/2024	1.2	Tyler Brooks	Work on Follow Up Letter re: City's Discovery Deficiencies
5/6/2024	1.0	Nathan Loyd	Review and revise Tyler Brooks letter on discovery issues and scheduling
5/6/2024	0.5	Peter Breen	Conf with Tyler Brooks regarding discovery issues & letter regarding same
5/6/2024	0.5	Peter Breen	Exchange emails with Planned Parenthood and City to set joint meet & confer
5/6/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Lucy Maloney re: Deposition
5/6/2024	0.4	Tyler Brooks	Continue Work on Discovery Deficiency Letter
5/6/2024	0.5	Tyler Brooks	Telephone Conferences with Peter Breen re: Letter to City re: Discovery Deficiencies
5/7/2024	0.6	Elizabeth Nielsen	Communications re: pro hac vice motion issue; deposition scheduling.
5/7/2024	1.1	Nathan Loyd	Prepare for and conduct meet and confer regarding lingering discovery issues, with Defendant and Planned Parenthood counsel
5/7/2024	1.0	Peter Breen	Review Tyler Brooks pre-meet & confer memo and letter, prep for meet & confer, conduct meet & confer
5/7/2024	0.5	Tyler Brooks	Finalize Discovery Deficiency Letter to City

5/7/2024	1.3	Tyler Brooks	Prepare Memo and Materials for Meet and Confer with PP and City's Counsel
5/7/2024	0.2	Tyler Brooks	Telephone Conference with Nathan Loyd re: Problems with City's Document Production
5/7/2024	0.5	Tyler Brooks	Meet and Confer re: Depositions with Counsel for Planned Parenthood Witnesses and City
5/7/2024	0.7	Tyler Brooks	Prepare and Send Letter re: Results of Meet and Confer
5/8/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Counsel for the City re: Rescheduling of Depositions
5/8/2024	1.2	Tyler Brooks	Prepare Stipulated Motion to Continue and Proposed Order
5/9/2024	0.4	Peter Breen	Review City's edits to discovery extension motion, propose additional changes to team
5/9/2024	0.5	Tyler Brooks	Exchange Email Correspondence with City re: Motion to Extend Deadlines and Proposed Order; Finalize and File with Court
5/9/2024	2.1	Tyler Brooks	Continue to Review and Analyze City's Document Production
5/9/2024	0.6	Tyler Brooks	Email City's Counsel re: Issue in Bates Numbers on City's Production
5/10/2024	0.2	Nathan Loyd	Draft email to City regarding duplicate production numbers
5/10/2024	0.1	Tyler Brooks	Receive and Review Court's Order on Stipulated Discovery Motion
5/13/2024	0.3	Tyler Brooks	Telephone Conference with Nathan Loyd re: Additional Review of City's Document Production
5/14/2024	0.5	Tyler Brooks	Telephone Conference with Peter Breen re: Document Review of City's Written Discovery Production
5/16/2024	0.7	Tyler Brooks	Review Additional Production of Documents by City
5/17/2024	3.0	Nathan Loyd	Analyze plaintiffs' production and identify corresponding Requests for Production
5/20/2024	1.0	Nathan Loyd	Review and analyze body cam footage responsive to Defendant's discovery requests.
5/21/2024	0.1	Nathan Loyd	Review and analyze body cam footage responsive to Defendant's discovery requests.
5/29/2024	0.5	Peter Breen	Review correspondence with City on confidentiality designations on Plaintiffs' videos, exchange emails with Tyler Brooks regarding need for designations and appropriate response to City's concerns, exchange emails with Tyler Brooks and Nathan Loyd regarding outstanding discovery issues

5/31/2024	0.7	Tyler Brooks	Exchange Email Correspondence with City's Counsel re: AEO Designations
5/31/2024	0.2	Tyler Brooks	Receive and Review Information from Clients re: Discovery
6/5/2024	2.5	Nathan Loyd	Review and compare City's productions against requests for production and document deficiencies
6/5/2024	0.2	Peter Breen	Conf with Tyler Brooks regarding discovery issues & need for IDR
6/5/2024	1.7	Tyler Brooks	Work on Letter to Counsel for Planned Parenthood re: Objections to Subpoenas
6/5/2024	0.2	Tyler Brooks	Telephone Conference with Nathan Loyd re: Processing and Analysis of Discovery
6/5/2024	0.2	Tyler Brooks	Call with Peter Breen re: Issues with City's Discovery
6/6/2024	0.3	Nathan Loyd	Call with Peter Breen on possible discovery letter and engagement with magistrate to resolve discovery disputes
6/6/2024	3.1	Nathan Loyd	Review and revise Tyler Brooks letter to Planned Parenthood counsel on discovery
6/6/2024	3.6	Nathan Loyd	Review and compare City's productions against requests for production and document deficiencies
6/6/2024	0.4	Peter Breen	Conf with Nathan Loyd regarding discovery letter & dispute resolution strategy
6/6/2024	0.5	Peter Breen	Exchange emails with cocounsel on City's deficiencies, strategy to resolve various discovery disputes and obtain full production by City
6/6/2024	1.0	Tyler Brooks	Work on Revisions to Letter to Counsel for Planned Parenthood re: Objection to Subpoenas
6/6/2024	0.4	Tyler Brooks	Exchange Email Correspondence with Clients re: Information for Case Strategy
6/6/2024	0.3	Tyler Brooks	Review and Analyze Materials from Co-Counsel Nathan Loyd re: PP Objections
6/7/2024	0.7	Nathan Loyd	Review and revise Tyler Brooks letter to Planned Parenthood counsel on discovery
6/7/2024	0.6	Peter Breen	Review and revise letter to Planned Parenthood regarding subpoenas; email with cocounsel regarding same
6/7/2024	0.2	Tyler Brooks	Receive and Review Amended Depositions from City; Compare to Schedule
6/7/2024	0.7	Tyler Brooks	Exchange Email Correspondence with Peter Breen and Nathan Loyd re: Letter to PP's Counsel

6/10/2024	0.5	Joan Mannix	Call with Tyler Brooks re: plaintiff depositions
6/10/2024	0.2	Nathan Loyd	Review and analyze new production from City
6/10/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Client Debra Braun re: Case Strategy
6/10/2024	0.5	Tyler Brooks	Telephone Conference with Joan Mannix re: Deposition Strategy
6/11/2024	0.5	Peter Breen	Conf with Tyler Brooks regarding Planned Parenthood discovery issues
6/11/2024	0.4	Peter Breen	Exchange emails with clients & cocounsel regarding potential supplemental production of latest incident reports at Planned Parenthood
6/11/2024	0.5	Tyler Brooks	Receive Response Correspondence from Counsel for Planned Parenthood and Respond re: Same
6/11/2024	0.5	Tyler Brooks	Telephone Conferences with Peter Breen re: Planned Parenthood Discovery/Depositions
6/11/2024	0.7	Tyler Brooks	Exchange Email Correspondence with Clients re: Information for Case Strategy and Deposition Scheduling
6/12/2024	0.4	Elizabeth Nielsen	Correspondence re: deposition schedules; reviewing record of correspondence.
6/12/2024	1.0	Joan Mannix	Discussion with Peter Breen, Tyler Brooks, and Nathan Loyd re: depositions
6/12/2024	2.4	Nathan Loyd	Review and analyze new production from City
6/12/2024	1.8	Peter Breen	Conferences with cocounsel regarding deposition strategy, witness prep, timing & staffing of depositions, teeing up outstanding discovery issues with City
6/12/2024	0.4	Tyler Brooks	Prepare Materials for Managing Counsel Joan Mannix for Review; Email re: Same
6/12/2024	0.6	Tyler Brooks	Exchange Email Correspondence with Elizabeth Nielsen and Other Local Counsel re: Deposition Preparation/Scheduling
6/12/2024	2.8	Tyler Brooks	Exchange Email Correspondence with Clients re: Deposition Scheduling; Confer with Co-Counsel Peter Breen, Joan Mannix, and Nathan Loyd re: Same
6/12/2024	0.4	Tyler Brooks	Review Email from Nathan Loyd re: Deficiencies in City's Production and Analyze for Further Follow Up Discovery Letter
6/13/2024	0.6	Joan Mannix	Call Tyler Brooks re: depositions
6/13/2024	0.8	Nathan Loyd	Review and analyze new production from City
6/13/2024	2.3	Nathan Loyd	Review and revise Tyler Brooks letter to city on lingering discovery discrepancies

6/13/2024	5.4	Tyler Brooks	Work on Further Follow Up on City's Discovery Deficiencies; Review and Analyze Discovery in Conjunction with Same
6/13/2024	0.6	Tyler Brooks	Telephone Conference with Joan Mannix re: Depositions
6/14/2024	0.4	Nathan Loyd	Discuss Client production with Tyler Brooks
6/14/2024	0.9	Nathan Loyd	Review and revise Tyler Brooks letter to city on lingering discovery discrepancies
6/14/2024	0.2	Peter Breen	Review correspondence from cocounsel regarding discovery supplementation issues
6/14/2024	0.5	Tyler Brooks	Finalize Draft Letter to City and Send to Co-Counsel for Review
6/14/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Nathan Loyd re: Discovery Responses from City
6/14/2024	0.5	Tyler Brooks	Telephone Conference with Nathan Loyd re: City's Discovery and Use for Upcoming Depositions
6/14/2024	0.7	Tyler Brooks	Email Clients re: Schedule/Details for Depositions
6/15/2024	0.2	Tyler Brooks	Email Client Lucy Maloney re: Deposition
6/15/2024	2.5	Tyler Brooks	Telephone Conference with Lucy Maloney re: Deposition
6/16/2024	1.8	Tyler Brooks	Travel (Drive) from Asheboro, NC to RDU, Park, and Proceed Through Security
6/16/2024	5.9	Tyler Brooks	Flight from RDU to Minneapolis, MN (no separate time charge for deposition prep in transit, specifically review Plaintiffs' Discovery to Determine Potential Areas of Examination by City)
6/16/2024	0.9	Tyler Brooks	Follow Up Call with Lucy Maloney re: Deposition
6/17/2024	2.4	Nathan Loyd	Review and analyze Maloney deposition transcript
6/17/2024	2.3	Tyler Brooks	Prepare for Defense of Lucy Maloney Deposition; Review Discovery in Conjunction with Same
6/17/2024	7.7	Tyler Brooks	Attend Deposition of Lucy Maloney
6/18/2024	0.2	Elizabeth Nielsen	PHV motion for Joan Mannix.
6/18/2024	3.0	Nathan Loyd	Discuss Braun and Wilkins deposition planning with clients, Tyler Brooks, and Joan Mannix
6/18/2024	3.5	Tyler Brooks	Review and Analyze Discovery and Maloney Deposition Transcript; Prepare Questions for Deposition of City's Witnesses
6/18/2024	2.4	Tyler Brooks	Work on Letter Responding to PP re: Deposition Subpoenas
6/18/2024	1.9	Tyler Brooks	Prepare for and Attend Meeting with Clients re: Discovery/Depositions
6/18/2024	0.5	Tyler Brooks	Email Managing Counsel Joan Mannix re: Deposition Preparation

6/19/2024	0.5	Nathan Loyd	Collect pertinent documents for Joan Mannix regarding upcoming deposition
6/19/2024	2.8	Nathan Loyd	Travel to Minneapolis for deposition (recording 1/2 time in transit)
6/19/2024	0.4	Tyler Brooks	Exchange Email Correspondence with Client Thomas Wilkin re: Deposition Planning
6/19/2024	1.3	Tyler Brooks	Prepare for Deposition of Debra Braun
6/19/2024	6.7	Tyler Brooks	Attend and Defend Deposition of Debra Braun taken by City
6/20/2024	3.5	Joan Mannix	Travel to MN from Chicago (no separate time charge-performed time charged tasks in transit); Review complaint, Lucy Maloney deposition and video of police officer explaining ordinance to Thomas Wilkins (3.0); Call Thomas Wilkins (.5)
6/20/2024	7.0	Nathan Loyd	Defend Debra Braun Deposition
6/20/2024	7.5	Tyler Brooks	Return Flight from Minneapolis, MN to RDU
6/21/2024	1.2	Tyler Brooks	Travel (Drive) from RDU to Asheboro, NC
6/21/2024	11.0	Joan Mannix	Call regarding depositions with Peter Breen, Tyler Brooks and Nathan Loyd (.5); review Braun deposition (.5); meet with Thomas Wilkins (.5); represent Thomas Wilkins at deposition (7.0); Return to Chicago from MN (2.5)
6/21/2024	0.5	Nathan Loyd	Call with Tyler Brooks, Peter Breen, and Joan Mannix to discuss Wilkins deposition
6/21/2024	3.0	Nathan Loyd	Travel (recording 1/2 time in transit)
6/21/2024	7.0	Nathan Loyd	Defend Thomas Wilkins Deposition
6/21/2024	0.5	Peter Breen	Conf with cocounsel regarding clients' depositions
6/21/2024	0.1	Tyler Brooks	Receive and Review City's Third Amended 30(b)(6) Deposition Notice
6/21/2024	0.8	Tyler Brooks	Confer with Co-Counsel Nathan Loyd and Joan Mannix re: Depositions
6/23/2024	0.4	Joan Mannix	Email with Peter Breen and Tyler Brooks re: 30(b)(6) deposition
6/23/2024	0.7	Tyler Brooks	Exchange Email Correspondence Among Peter Breen, Joan Mannix, and Nathan Loyd re: 30(b)(6) Issues and Need to Meet and Confer re: Same
6/23/2024	0.5	Tyler Brooks	Exchange Email Correspondence with Brian Gipson of PLAM re: 30(b)(6) Deposition
6/24/2024	0.5	Tyler Brooks	Prepare for and Attend Meet and Confer with City re: City's 30(b)(6) Notice
6/24/2024	0.2	Tyler Brooks	Email Co-Counsel re: Results of Meet and Confer re: Discovery
6/25/2024	0.4	Nathan Loyd	Review and revise Tyler Brooks letter to Planned Parenthood on discovery deficiencies

6/25/2024	1.8	Nathan Loyd	Review and revise Tyler Brooks letter to city on lingering production issues
6/25/2024	5.1	Nathan Loyd	Review and summarize documents provided in Planned Parenthood production
6/25/2024	0.3	Peter Breen	Exchange emails with cocounsel regarding key documents in Planned Parenthood production
6/25/2024	0.5	Peter Breen	Review and revise letter to Planned Parenthood regarding discovery issues
6/25/2024	0.9	Peter Breen	Review and revise letter to City regarding discovery issues; exchange emails with cocounsel regarding deficiencies in City's production and updating letter to reflect them; review key documents missing from City's production
6/25/2024	1.5	Tyler Brooks	Work on Written Correspondence Responding to PP re: Subpoenas for Depositions of Employees
6/25/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Counsel for the City re: Scheduling 30(b)(6) and Goodman Depositions
6/25/2024	0.7	Tyler Brooks	Review and Analyze Discovery Produced by Planned Parenthood
6/25/2024	0.1	Tyler Brooks	Receive and Review City's Fourth 30(b)(6) Notice
6/25/2024	0.6	Tyler Brooks	Confer with Nathan Loyd re: Discrepancies in PP Discovery versus City's Responses
6/26/2024	0.8	Nathan Loyd	Meet and confer with city defendants on 30b6 topics
6/26/2024	1.4	Nathan Loyd	Draft letter to Defendant on production deficiencies
6/26/2024	1.8	Nathan Loyd	Call with Peter Breen and Tyler Brooks on production from City and path forward with existing documents
6/26/2024	2.5	Peter Breen	Conferences with cocounsel regarding various significant discovery issues still unresolved between parties regarding meet & confer with City on discovery, attend meet & confer with City
6/26/2024	0.7	Peter Breen	Further review and revision of newest meet & confer letter with City on variety of discovery deficiencies; exchange emails regarding same
6/26/2024	0.5	Peter Breen	Brief research on one of City's attorney of record, Amy Schutt, now disclosed as a "volunteer leader" by Planned Parenthood, correspondence with cocounsel regarding same, exchange email correspondence with clients regarding same
6/26/2024	0.8	Tyler Brooks	Prepare for and Attend Meet and Confer re: Rule 30(b)(6) Deposition

6/26/2024	1.2	Tyler Brooks	Telephone Conference with Peter Breen re: 30(b)(6) Deposition Topics and Strategy
6/27/2024	0.3	Nathan Loyd	Review magistrate rules for informal ruling on discovery dispute
6/27/2024	0.5	Nathan Loyd	Call with Tyler Brooks and Peter Breen on informal dispute process plan
6/27/2024	5.6	Nathan Loyd	Draft summary of errors and issues remaining in City's discovery including likely privilege waiver
6/27/2024	0.7	Peter Breen	Review recommendations of Nathan Loyd on which discovery objections and issues to present to Court, which to continue to negotiate, and which to withdraw; review rules of Judge Foster for IDR
6/27/2024	0.3	Peter Breen	Various correspondence incl with opposing counsel regarding scheduling of IDR hearing with Judge Foster
6/27/2024	3.5	Tyler Brooks	Work on Statement for Issues for IDR Process
6/27/2024	1.2	Tyler Brooks	Telephone Conference with Peter Breen and Nathan Loyd re: IDR Conference Arguments
6/27/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Debra Braun re: Counseling at PP under Ordinance
6/27/2024	0.8	Tyler Brooks	Follow Up Call with Peter Breen re: Discovery and IDR with Judge Foster
6/28/2024	0.1	Nathan Loyd	Review Planned Parenthood's letter on depositions
6/28/2024	2.0	Nathan Loyd	Review and revise Tyler Brooks letter for upcoming IDR.
6/28/2024	0.8	Peter Breen	Review, revise, and finalize summary of IDR dispute per request of Judge Foster's Chambers
6/28/2024	2.4	Tyler Brooks	Work on Draft of Statement for IDR before Judge Foster
7/1/2024	0.1	Nathan Loyd	Review new videos provided by client for responsiveness and privilege
7/1/2024	0.8	Nathan Loyd	Review and revise Tyler Brooks 30b6 notice draft
7/1/2024	0.8	Nathan Loyd	Review and revise Tyler Brooks 30b6 notice draft
7/1/2024	2.2	Nathan Loyd	Prepare Brian Gibson for 30b6 deposition
7/1/2024	3.3	Nathan Loyd	Draft motion to compel Planned Parenthood witnesses
7/1/2024	1.4	Peter Breen	Review and analyze Planned Parenthood discovery dispute letter, correspondence with opposing counsel regarding scheduling meet & confer on PP letter, correspondence with opposing counsel seeking consent to extend discovery cutoff due to refusal by PP to produce witnesses
7/1/2024	2.3	Tyler Brooks	Work on Letter to City re: 30(b)(6) Deposition
7/2/2024	0.5	Nathan Loyd	Review new videos provided by client for responsiveness and privilege

7/2/2024	0.9	Nathan Loyd	Call with Peter Breen on meet and confer plans and conduct meet and confer
7/2/2024	1.8	Nathan Loyd	Prepare Brian Gibson for 30b6 deposition
7/2/2024	3.2	Nathan Loyd	Draft memo on numerous deficiencies in Planned Parenthood's productions
7/2/2024	1.8	Peter Breen	Prep for meet & confer, conference with Nathan Loyd regarding same, exchange emails with Nathan Loyd regarding PP's missing documents and improper privilege claims, conduct meet & confer
7/2/2024	0.5	Peter Breen	Finalize & send letter to City regarding 30(b)(6) topics dispute
7/2/2024	1.7	Tyler Brooks	Drive from Asheboro, NC to RDU, Park, Proceed through Security
7/2/2024	6.2	Tyler Brooks	Flight to Minneapolis, MN (no separate charge for work performed in transit, namely review of 30(b)(6) topics and discovery to prepare witness for deposition)
7/2/2024	2.7	Tyler Brooks	Deposition Preparation of 30(b)(6) Witness for PLAM with Brian Gibson
7/2/2024	0.6	Tyler Brooks	Exchange Email Correspondence with Nathan Loyd re: Video Exhibits
7/2/2024	0.3	Tyler Brooks	Receive and Review Court Order Setting IDR
7/2/2024	3.7	Tyler Brooks	Review and Analyze Discovery and Prepare for 30(b)(6) Deposition of PLAM
7/3/2024	0.4	Joan Mannix	call with Tyler Brooks re: 30(b)(6) deposition
7/3/2024	0.4	Peter Breen	Review correspondence from City's position on 30(b)(6) topics and NL's contemporaneous notes of prior meet & confer on same
7/3/2024	8.4	Tyler Brooks	Attend 30(b)(6) Deposition of PLAM (Brian Gibson)
7/3/2024	6.8	Tyler Brooks	Flight from Minneapolis, MN to RDU (no separate entry for work performed in transit, specifically analysis of 30(b)(6) deposition and impact on case strategy)
7/3/2024	0.2	Tyler Brooks	Call with Nathan Loyd re: Deposition
7/3/2024	0.4	Tyler Brooks	Call with Joan Mannix re: 30(b)(6) Deposition
7/4/2024	1.4	Tyler Brooks	Travel (Drive) from RDU to Asheboro, NC
7/5/2024	3.0	Nathan Loyd	Call with Peter Breen on amending complaint and subpoena (1); continue work on draft IDR letter
7/5/2024	1.1	Peter Breen	Conf with Nathan Loyd regarding Planned Parenthood subpoenas duces tecum and PP documents/deposition strategy, potential need to amend complaint to add add'l viewpoint targeting allegations based on disclosures in discovery, follow up correspondence with Nathan Loyd regarding PP deposition issues

7/5/2024	1.2	Peter Breen	Brief research on duty of municipalities in Minnesota to retain communications of City Council members and City's continued ownership of those communications; email to opposing counsel regarding same, responding to contention Member Goodman's text messages about ordinance are regarding not in "control" of City, and also noting that subpoena to Goodman sought her personal records; correspondence with local counsel for add'l information on contours of Minnesota Government Data Practice Act
7/8/2024	0.2	Peter Breen	Email to PP to preliminarily set dates for Williams and Stanley depositions, if Court denies relief
7/8/2024	0.7	Peter Breen	Draft motion to extend discovery cutoff consistent with City's terms, correspondence with opposing counsel regarding same
7/8/2024	0.5	Tyler Brooks	Review and Analyze Draft Motion for Extension of Time; Confer with Peter Breen re: Same
7/9/2024	4.5	Nathan Loyd	Continue drafting IDR letter outlining positions on City privilege claims
7/9/2024	3.0	Peter Breen	Review and analyze issues for IDR hearing, revise and further revise IDR letter to Court, conference with cocounsel regarding various discovery issues in preparation for IDR hearing
7/9/2024	0.3	Peter Breen	Exchange emails with City regarding parties' mutual intent to move for summary judgment
7/9/2024	0.5	Peter Breen	Review City's proposed edits to stipulated motion to extend discovery cutoff, add City's edits and further revisions to accommodate counsel for Planned Parenthood's scheduling issues; further correspondence with opposing counsel regarding same
7/9/2024	1.1	Peter Breen	Exchange emails with local counsel regarding Goodman documents and MN law on data retention; brief research on Department of Administration opinions regarding same
7/9/2024	0.8	Tyler Brooks	Receive, Review, and Analyze City's Supplemental Discovery Responses
7/9/2024	1.4	Tyler Brooks	Review and Analyze City's Privilege Log, as Analyzed by Nathan Loyd, and Consider Issues re: IDR
7/9/2024	2.3	Tyler Brooks	Work on Analysis for IDR re: City's Document Production
7/9/2024	0.8	Tyler Brooks	Receive and Review Letter from Counsel for Planned Parenthood Witnesses re: Depositions
7/9/2024	2.2	Tyler Brooks	Telephone Conference with Peter Breen and Nathan Loyd re: Preparations for IDR and Arguments re: City's Discovery Deficiencies

7/10/2024	0.5	Peter Breen	Call with Tyler Brooks regarding IDR hearing
7/10/2024	0.5	Peter Breen	Call with Tyler Brooks regarding discovery hearing
7/10/2024	0.3	Peter Breen	Email correspondence to Tyler Brooks regarding deposition staffing, putting off Goodman deposition, and adding allegations to amended complaint to show ordinance is content-based and viewpoint discriminatory
7/10/2024	0.7	Peter Breen	Exchange correspondence with opposing counsel regarding resetting Goodman deposition and seeking her production of communications, further correspondence with cocounsel regarding availability to take Goodman deposition, confirm date with opposing counsel
7/10/2024	0.6	Tyler Brooks	Telephone Conference with Peter Breen re: Discovery Tasks and Upcoming IDR Conference with Court
7/10/2024	0.2	Tyler Brooks	Receive and Review Court's Order Extending Time; Update Deadlines
7/11/2024	2.4	Nathan Loyd	Prepare for and conduct IDR
7/11/2024	3.0	Peter Breen	Prep for IDR conference, present argument at IDR conference, confer with cocounsel regarding Court's ruling and next steps
7/11/2024	1.3	Tyler Brooks	Prepare for IDR Conference with Judge Foster
7/11/2024	1.1	Tyler Brooks	Attend IDR Conference with Judge Foster
7/11/2024	0.8	Tyler Brooks	Telephone Conference with Peter Breen re: IDR Conference Ruling and Results
7/12/2024	0.4	Peter Breen	Corr with cocounsel regarding Goodman deposition notice, review & approve notice
7/15/2024	0.4	Peter Breen	Conf with Tyler Brooks regarding City's 30(b)(6) letter, review same
7/15/2024	0.3	Tyler Brooks	Receive and Review Letter from City Attorney Sara Lathrop re: 30(b)(6) Witness; Confer with Peter Breen re: Same
7/19/2024	0.4	Nathan Loyd	Review Planned Parenthood letter on deposition topics
7/19/2024	1.1	Peter Breen	Review & analyze Planned Parenthood's latest letter on proposed limits to deposition topics; exchange correspondence with cocounsel regarding same, arrive at agreement points and counterproposals, Tyler Brooks to follow up with Hennigan
7/19/2024	0.3	Tyler Brooks	Call and Leave Voicemail for Peter Hennigan (Counsel for Planned Parenthood) re: Depositions; Send Follow Up Email re: Same
7/22/2024	0.5	Peter Breen	Conf with Tyler Brooks regarding Planned Parenthood's depositions and potential for agreement on deposition topics

7/22/2024	0.5	Peter Breen	Review & approve letter to Planned Parenthood on potential agreement to deposition topics; convey letter with explanatory email to PP's counsel
7/22/2024	2.6	Tyler Brooks	Work on Draft Motion to Compel re: Planned Parenthood Witnesses' Depositions
7/22/2024	3.7	Tyler Brooks	Work on Letter to Counsel for Planned Parenthood re: Depositions; Receive and Review Email in Response
7/22/2024	0.7	Tyler Brooks	Review and Analyze Filings by Witnesses for Planned Parenthood re: Protective Order
7/22/2024	0.5	Tyler Brooks	Telephone Conference with Peter Breen re: Planned Parenthood Witness Issues
7/25/2024	0.3	Peter Breen	Review PP response letter to our deposition letter
7/26/2024	1.2	Peter Breen	Draft reply letter to PP response; exchange emails with PP's counsel regarding PP deposition topic issue and availability
7/31/2024	0.2	Peter Breen	Conf with Tyler Brooks regarding PP depositions timing and staffing
7/31/2024	0.4	Tyler Brooks	Exchange Email Correspondence with Client Debra Braun re: Planned Parenthood
7/31/2024	0.1	Tyler Brooks	Exchange Emails with Peter Hennigan re: Depositions
7/31/2024	0.2	Tyler Brooks	Telephone Conference with Peter Breen re: Planned Parenthood Depositions
8/2/2024	0.3	Peter Breen	Exchange emails with PP's counsel regarding deposition timing
8/4/2024	0.2	Peter Breen	Instruct paralegal to prepare regarding subpoena to Williams for agreed date
8/7/2024	1.4	Tyler Brooks	Further Revise and Issue Deposition Subpoenas, with detailed list of examination topics and areas precluded from examination
8/13/2024	0.6	Tyler Brooks	Exchange Email Correspondence with Local Counsel re: Deposition of CM Goodman
8/14/2024	0.2	Peter Breen	Conf with Tyler Brooks regarding discovery issues
8/14/2024	0.2	Peter Breen	Exchange emails with cocounsel regarding unavailability of PP witness Stanley until after close of discovery, impact on timing of 30(b)(6) deposition of City
8/14/2024	0.2	Tyler Brooks	Telephone Conference with Peter Breen re: Status of Documents Productions by City
8/15/2024	0.2	Peter Breen	Further exchange of emails on 30(b)(6) deposition timing due to Stanley unavailability and need for extension of discovery cutoff

8/19/2024	0.2	Peter Breen	Corr with cocounsel regarding discovery strategy call to plan remaining depositions and address outstanding written discovery issues
8/20/2024	2.0	Nathan Loyd	Call with Peter Breen and Tyler Brooks on City's clawback notice and potential waivers and lingering production
8/20/2024	2.1	Nathan Loyd	Review and analyze new City productions, identify and document key files
8/20/2024	2.0	Peter Breen	Conf with cocounsel regarding remaining discovery issues, including City's late clawback of documents, waiver of privilege on those documents, continued deficiencies in production, planning prep for Stanley & Williams depositions
8/20/2024	0.4	Tyler Brooks	Exchange Email Correspondence with City's Counsel re: Document Productions
8/20/2024	0.6	Tyler Brooks	Send Follow Up Email to City re: Materials Ordered in IDR
8/20/2024	0.5	Tyler Brooks	Receive and Review Analysis of Meet and Confer from Nathan Loyd Post Conference
8/21/2024	6.5	Nathan Loyd	Legal research on clawback of purportedly privileged documents, including waiver of privilege, requirements for timeliness and reasonableness, impact of repeated and numerous disclosures, etc.; prepare detailed analysis for senior lawyers discussing relevant cases and applying them here, reviewing and analyzing clawed back documents for potential challenge to clawback and waiver of privilege
8/21/2024	0.2	Peter Breen	Exchange emails with Tyler Brooks confirming availability for proposed 30(b)(6) date
8/22/2024	1.4	Nathan Loyd	Review and analyze new City productions, identify and document key files
8/22/2024	2.5	Nathan Loyd	Exchange emails with cocounsel on detailed analysis; Further followup research on clawback and privilege issues
8/22/2024	0.9	Peter Breen	Review Nathan Loyd analysis of clawback and privilege waiver issues, email Nathan Loyd with additional factors to add to analysis
8/22/2024	0.3	Tyler Brooks	Review and Issue Subpoena to Witness Stanley
8/22/2024	0.7	Tyler Brooks	Exchange Email Correspondence with Local Counsel's Office re: Deposition Scheduling and Logistics
8/22/2024	0.4	Tyler Brooks	Receive and Analyze Additional Document Production from City
8/23/2024	6.2	Nathan Loyd	Continue review and analysis of new City productions, identify and document key files
8/23/2024	0.2	Tyler Brooks	Email City's Counsel re: CM Goodman Materials Prior to Deposition

8/23/2024	1.3	Tyler Brooks	Receive and Review City's Answers to Contention Interrogatories
8/24/2024	8.6	Nathan Loyd	Draft outline, identify and prepare key documents for Goodman deposition
8/25/2024	0.3	Tyler Brooks	Receive Email from Debra Braun re: Planned Parenthood Escorts
8/25/2024	9.7	Tyler Brooks	Continue review of relevant Discovery materials and Preparation of Deposition Outline for CM Goodman, Including Questions about Exhibits
8/26/2024	3.5	Nathan Loyd	Discuss Goodman deposition strategy with Tyler Brooks, including selecting key documents for deposition, questioning lines to elicit information, and contingency plans for uncooperative witness
8/26/2024	3.7	Nathan Loyd	Travel (1/2 time) for Goodman deposition
8/26/2024	5.7	Nathan Loyd	Complete preparation for Goodman deposition, including outline and strategy
8/26/2024	2.6	Tyler Brooks	Exchange Email Correspondence with Nathan Loyd re: Clawback Dispute;
8/26/2024	1.5	Tyler Brooks	Review and Analyze Chronology Created by Nathan Loyd
8/26/2024			Travel (Drive) from Asheboro, Park, Proceed through Security
8/26/2024	7.2	Tyler Brooks	Flight from RDU to Minneapolis, MN (no separate entry for work performed in transit, namely review and analysis of discovery in preparation of questions to ask in deposition CM Goodman)
8/26/2024	2.5	Tyler Brooks	Prepare for Goodman Deposition with Nathan Loyd
8/26/2024	3.5	Tyler Brooks	Work on Deposition Preparation and Deposition Outline, in conjunction with Review of Discovery Materials
8/27/2024	7.5	Nathan Loyd	Finalize preparation of outline and attend Goodman deposition
8/27/2024	0.5	Peter Breen	Conf with Tyler Brooks regarding Goodman deposition issues
8/27/2024	1.7	Tyler Brooks	Prepare for Deposition of CM Goodman
8/27/2024	5.9	Tyler Brooks	Depose CM Goodman
8/27/2024	1.8	Tyler Brooks	Post-Deposition Conference with Nathan Loyd re: Materials Learn in Deposition and Future Deposition Strategy
8/27/2024	7.9	Tyler Brooks	Flight from Minneapolis, MN to RDU (no separate charge for work performed in transit, viz., analysis of CM Goodman's deposition and effect on case strategy)
8/27/2024	0.5	Tyler Brooks	Call with Peter Breen re: Goodman Deposition
8/28/2024	1.3	Tyler Brooks	Drive from RDU to Asheboro, NC
8/28/2024	5.3	Nathan Loyd	Travel (1/2 time) for Goodman deposition
8/29/2024	5.1	Nathan Loyd	Review privilege claims from deposition and conduct legal research on basis for privilege claims

8/29/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Lucy Maloney re: Deposition
8/30/2024	0.5	Nathan Loyd	Review and revise Tyler Brooks letter on 30b6 topics
8/30/2024	5.9	Nathan Loyd	Draft position on challenges to City privilege claims
8/30/2024	0.5	Peter Breen	Review Nathan Loyd additional detailed analysis and recommended next steps on privilege and clawback issues, especially in view of the City's overzealous assertions of privilege during Goodman deposition
8/30/2024	0.5	Peter Breen	Review & revise Tyler Brooks letter on 30(b)(6) deposition topics
8/30/2024	4.7	Tyler Brooks	Work on Detailed Letter to City re: Dispute over Topics for its 30(b)(6) Deposition
8/30/2024	0.8	Tyler Brooks	Review and Analyze New Detailed Analysis from Nathan Loyd re: City's Discovery and Attempted Clawback
8/30/2024	0.5	Tyler Brooks	Exchange Email with Clients re: Abortion Facilities
9/3/2024	1.8	Nathan Loyd	Draft outline, identify and prepare key documents for Williams deposition
9/4/2024	7.6	Nathan Loyd	Draft outline, identify and prepare key documents for Williams deposition
9/4/2024	6.7	Tyler Brooks	Prepare for Deposition of Kelli Williams (Planned Parenthood) with Drafting of Deposition Outline and Organization of Deposition Exhibits
9/5/2024	3.9	Nathan Loyd	Draft outline, identify and prepare key documents for Williams deposition
9/5/2024	5.6	Nathan Loyd	Travel for Williams depo
9/5/2024	0.7	Tyler Brooks	Receive and Analyze Additional Materials from Nathan Loyd re: Preparation for Deposition of Kelli Williams
9/5/2024	1.7	Tyler Brooks	Travel (Drive) from Asheboro, NC to RDU, Park, Proceed through Security
9/5/2024	7.2	Tyler Brooks	Flight from RDU to Minneapolis, MN (no separate entry for work performed in transit, namely review discovery and preparation of questions for Williams Deposition)
9/5/2024	2.8	Tyler Brooks	Continue Preparations for Kelli Williams Deposition; Incorporate Outline Sections Prepared by Nathan Loyd
9/6/2024	6.8	Nathan Loyd	Attend Williams deposition
9/6/2024	7.2	Nathan Loyd	Travel for Williams depo
9/6/2024	1.3	Tyler Brooks	Draft outline, identify and prepare key documents for Williams deposition
9/6/2024	5.5	Tyler Brooks	Attend Deposition of Kelli Williams
9/6/2024	7.4	Tyler Brooks	Flight from Minneapolis, MN to RDU (no separate charge for work performed in transit, specifically, analysis of Williams Deposition and Preparation of Questions for Stanley Deposition)
9/7/2024	1.3	Tyler Brooks	Travel (Drive) from RDU to Asheboro, NC

9/9/2024	0.8	Nathan Loyd	Train team on ediscovery vendor for future depositions
9/9/2024	0.4	Peter Breen	Exchange emails with cocounsel regarding 30(b)(6) issues, extension of discovery cutoff, and clawback response letter, conference with Tyler Brooks regarding same
9/9/2024	0.2	Tyler Brooks	Email Counsel for the City re: 30(b)(6) Schedule/Deadlines
9/9/2024	0.5	Tyler Brooks	Confer with Peter Breen and then Follow Up with Nathan Loyd re: Letter on Clawback Issue
9/10/2024	1.0	Nathan Loyd	Conversation with Peter Breen on extension to discovery and lingering production issues
9/10/2024	1.1	Nathan Loyd	Draft letter on privilege clawback
9/10/2024	1.2	Peter Breen	Conf with Nathan Loyd regarding contents of privilege clawback letter, status of outstanding discovery deficiencies, need for extension of discovery cutoff; email to cocounsel regarding same
9/10/2024	0.5	Peter Breen	Exchange multiple emails with opposing counsel regarding discovery cutoff, 30(b)(6) topic issues, and need for court intervention
9/10/2024	0.3	Peter Breen	Exchange emails with Tyler Brooks about whether Stanley deposition should go forward in view of the parties' dispute over the scope of privilege
9/10/2024	0.8	Tyler Brooks	Receive and Review Email Directive from Peter Breen and Correspondence from Counsel from the City re: Deadlines/Scheduling and Clawback
9/11/2024	0.5	Joan Mannix	review/revise draft of letter re: privilege claims and clawback
9/11/2024	2.9	Nathan Loyd	Continue drafting letter on privilege clawback, circulate draft
9/11/2024	0.4	Peter Breen	Review & revise letter asserting waiver of privilege and improper clawback
9/12/2024	0.5	Joan Mannix	Call re discovery issues with Peter Breen, Tyler Brooks, Nathan Loyd
9/12/2024	0.5	Tyler Brooks	Call with Joan Mannix, Peter Breen, and Nathan Loyd re: Outstanding Discovery Issues and 30(b)(6) Issues with City
9/12/2024	0.6	Nathan Loyd	Call with Tyler Brooks, Joan Mannix, and Peter Breen on 30b6 meet and confer
9/12/2024	1.3	Nathan Loyd	Draft outline, identify and prepare key documents for Stanley deposition
9/12/2024	0.9	Tyler Brooks	Prepare for Meet and Confer with City's Counsel re: Discovery/30(b)(6) Issues by Review of Notice and City's Objections and Attend Meet and Confer to Discuss Same

9/12/2024	1.4	Peter Breen	Conf with cocounsel regarding 30(b)(6) meet and confer, regarding plan and prep for Stanley deposition; attend meet & confer with City on 30(b)(6) general issues and 19 specific topics
9/12/2024	0.8	Tyler Brooks	Telephone Conference with Peter Breen re: Strategy for Tim Stanley Deposition
9/13/2024	0.3	Peter Breen	Review City's email recapping 30(b)(6) meet and confer, exchange emails with cocounsel regarding same
9/13/2024	0.5	Peter Breen	Exchange emails with opposing counsel regarding proposed motion to extend scheduling order, review & provide revisions to motion, correspondence with cocounsel regarding same
9/14/2024	7.1	Nathan Loyd	Draft outline, identify and prepare key documents for Stanley deposition
9/14/2024	6.5	Tyler Brooks	Work on Deposition Outline for Deposition of Tim Stanley (Planned Parenthood) and Organize Exhibits
9/15/2024	3.5	Peter Breen	Review Stanley outline & exhibits, revise and extend outline
9/15/2024	1.4	Tyler Brooks	Travel (Drive) from Asheboro, NC to RDU
9/15/2024	6.4	Tyler Brooks	Flight from RDU to Minneapolis (no separate charge for work performed in transit, specifically continued drafting of deposition outline for Stanley Deposition)
9/15/2024	4.7	Tyler Brooks	Continue Work on Preparations for Deposition of Tim Stanley
9/16/2024	1.0	Nathan Loyd	Advise remotely on document questions during Stanley deposition from Peter Breen
9/16/2024	6.5	Peter Breen	Attend and assist at deposition of Stanley, correspondence & conference with Nathan Loyd before regarding and during deposition to secure regarding additional exhibits needed based on witness testimony, conference with Tyler Brooks & CF during breaks regarding strategy Stanley's evasions and extreme forgetfulness; review emails from City's counsel about clawback of MPLS 568 and review City's redacted version of exhibit; exchange emails with Nathan Loyd regarding impact of City designating attorney (& PP "volunteer leader") Amy Schutt as one of its 30(b)(6) witnesses
9/16/2024	6.4	Tyler Brooks	Depose Timothy Stanley
9/16/2024	7.1	Tyler Brooks	Travel Flight from Minneapolis, MN to Asheboro, NC (no separate charge for work performed in transit, specifically analysis of Stanley Deposition and Effect on What Needs to be Obtained in 30(b)(6) Deposition
9/16/2024	0.2	Tyler Brooks	Review Order Setting New Schedule and Deadlines
9/17/2024	1.3	Tyler Brooks	Travel (Drive) from RDU to Asheboro, NC

9/17/2024	1.2	Nathan Loyd	Review Tim Stanley Deposition transcript
9/21/2024	3.4	Nathan Loyd	Legal research on possible privilege waiver and deposition strategy for attorney as a 30b6 witness
9/23/2024	5.6	Nathan Loyd	Legal research on possible privilege waiver and deposition strategy for attorney as a 30b6 witness
9/24/2024	3.7	Nathan Loyd	Draft legal memo summarizing possible privilege waiver and deposition strategy for attorney as a 30b6 witness
9/25/2024	0.2	Nathan Loyd	Draft legal memo summarizing possible privilege waiver and deposition strategy for attorney as a 30b6 witness
9/26/2024	0.2	Nathan Loyd	Review Sisters for Life decision for precedent affecting present case
9/27/2024	0.4	Nathan Loyd	Conversation with Tyler Brooks on 30b6 plan
9/27/2024	0.5	Peter Breen	Conf with cocounsel regarding City enforcement actions
9/27/2024	0.5	Tyler Brooks	Call with Peter Breen and Nathan Loyd re: City's Actions to Enforce as Shown in Discovery
9/28/2024	0.4	Peter Breen	Review article on Minneapolis hiring 23 new police officers, including opening recruiting efforts to permanent residents, correspondence with cocounsel regarding impact of these new policies on City's allegations it cannot staff up police force
9/30/2024	1.3	Nathan Loyd	Conversation with Peter Breen on remaining case strategy, including deposition, discovery challenges
9/30/2024	1.8	Nathan Loyd	Legal research for privilege assertions and clawback (1.6), call with Tyler Brooks to prepare for meet and confer for privilege topics (.2)
9/30/2024	1.3	Peter Breen	Conf with Nathan Loyd regarding remaining discovery issues, framing privilege waiver and improper clawback for court intervention, discovery materials showing underlying viewpoint discrimination and content based regulation
9/30/2024	0.2	Tyler Brooks	Call with Nathan Loyd re: Piercing City's Privilege Claims
10/1/2024	0.7	Nathan Loyd	Draft letter documenting arguments on privilege claims following meet and confer
10/1/2024	0.9	Tyler Brooks	Conference Call with Peter Breen re: Preparations for Meet and Confer
10/1/2024	0.6	Tyler Brooks	Prepare for and Attend Meet and Confer with City re: Privilege Issues/Discovery Dispute
10/1/2024	0.6	Tyler Brooks	Review Correspondence re: Argument/Strategy on City's Clawback Claims

10/2/2024	0.7	Michael McHale	Review Am. Cmplt. and Order denying MTD re: claim for content-/viewpoint-based targeting
10/2/2024	0.7	Nathan Loyd	Review and analyze new City productions, identify and document key files
10/2/2024	0.8	Nathan Loyd	Call with Peter Breen to summarize new documents and possible subject matter waiver
10/2/2024	4.9	Nathan Loyd	Continue drafting letter documenting arguments on privilege claims following meet and confer
10/2/2024	0.9	Peter Breen	Conf with Nathan Loyd regarding new document production, regarding caselaw on and arguments necessary to win waiver of privilege and challenge to clawback
10/2/2024	0.4	Peter Breen	Review Michael McHale's analysis and supporting briefing on our discovery documents supporting content/viewpoint targeting, correspondence regarding same
10/2/2024	1.5	Tyler Brooks	Receive and Analyze City's Supplement Discovery
10/3/2024	2.7	Nathan Loyd	Continue drafting letter documenting arguments on privilege claims following meet and confer
10/4/2024	0.6	Nathan Loyd	Finalize details on production dates for privilege claims letter
10/4/2024	0.6	Peter Breen	Review & revise privilege letter, correspondence with cocounsel regarding same, research case citations
10/4/2024	0.4	Peter Breen	Confer with Tyler Brooks about edits to letter, including scope of subject matter waiver
10/4/2024	0.4	Tyler Brooks	Telephone Conference with Peter Breen re: Status of Discovery Responses and Effect of Privilege Claims
10/4/2024	4.6	Tyler Brooks	Work on and Send Letter to City re: Remaining Discovery Issues, Including Clawback
10/8/2024	0.1	Tyler Brooks	Receive Letter from Sara Lathrop (Attorney for City) re: Setting Meet and Confer
10/9/2024	0.3	Peter Breen	Exchange emails with cocounsel to set meet & confer with City, including which counsel should be present
10/11/2024	0.5	Nathan Loyd	Preparation call with Tyler Brooks for meet and confer on privilege
10/11/2024	0.8	Nathan Loyd	Meet and confer with City on privilege waivers
10/11/2024	0.9	Nathan Loyd	Compiled list of documents with likely waiver
10/11/2024	1.2	Nathan Loyd	Analyze City productions, identify and deconflict bates number overlaps and issues with City production

10/11/2024	1.2	Peter Breen	Prepare regarding for and attend meet & confer on discovery issues, including waiver of privilege, improper clawback, and inadequate search, correspondence with cocounsel regarding same
10/11/2024	1.2	Tyler Brooks	Prepare for Meet and Confer with Counsel for City on Privilege Issues
10/11/2024	0.2	Tyler Brooks	Email Peter Breen re: Meet and Confer
10/11/2024	0.8	Tyler Brooks	Exchange Email Correspondence with Nathan Loyd re: Documents with Issues
10/11/2024	0.4	Tyler Brooks	Exchange Email Correspondence with City Attorney Tracey Fussy re: Documents Needing Clarification
10/11/2024	0.5	Tyler Brooks	Prepare for and Attend Meet and Confer with the City re: Outstanding Discovery Disputes
10/16/2024	0.4	Tyler Brooks	Exchange Email Correspondence with Counsel re: Case Strategy/Discovery
10/16/2024	0.4	Tyler Brooks	Email Opposing Counsel re: Need to Present Discovery Issue to Court
10/22/2024	0.1	Tyler Brooks	Call to Judge Foster's Chambers for Hearing Dates
10/23/2024	0.3	Tyler Brooks	Exchange Email Correspondence with Sara Lathrop, attorney for the City, re: Proposed Changes to Deadlines; Exchange Emails re: Hearing Date
10/25/2024	0.3	Peter Breen	Exchange correspondence with cocounsel and opposing counsel regarding scheduling hearing for Plaintiffs' motion to compel
10/25/2024	0.4	Peter Breen	Review court's order to enter settlement discussions, exchange correspondence with cocounsel regarding same
10/25/2024	0.1	Tyler Brooks	Call to Judge Foster's Chambers for New Hearing Dates; Second Call to Confirm Date
10/25/2024	0.2	Tyler Brooks	Receive and Consider Court's Notice re: Order to Conduct Settlement Discussions; Set Deadlines
10/25/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Counsel for City re: Hearing Date and Meet and Confer Date
10/28/2024	0.3	Peter Breen	Exchange emails with City regarding settlement conference and settlement demand
10/28/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Counsel for City re: Hearing Date and Meet and Exchange Email Correspondence re: Meet and Confer Date Confer Date
10/29/2024	0.3	Joan Mannix	Review draft of stipulation to extend discovery deadlines

10/29/2024	2.5	Tyler Brooks	Draft and Circulate to Peter Breen and Joan Mannix Proposed Stipulated Motion and Proposed Order to Extend Deadlines; Incorporate Changes; Finalize and Email to City's Counsel
10/30/2024	0.5	Peter Breen	Exchange correspondence with opposing counsel and with cocounsel regarding joint motion to extend dates and resolving differences in setting out further dates
10/30/2024	1.3	Peter Breen	Confer with Tyler Brooks & Gibson/PLAM regarding potential settlement demands, exchange correspondence with cocounsel regarding settlement demand
10/30/2024	0.8	Tyler Brooks	Confer with Peter Breen and Brian Gibson (PLAM) re: Settlement Possibilities
10/30/2024	0.5	Tyler Brooks	Email Clients re: Settlement Discussions; Receive Responses
10/30/2024	1.2	Tyler Brooks	Exchange Email Correspondence with City re: Proposed Dates in Stipulated Motion; Make Revisions and File Motion and Proposed Order
10/30/2024	5.6	Tyler Brooks	Receive and Analyze City's "Amended" Rule 26(a) Initial Disclosures; Email Co-Counsel re: Same; Research Case Law re: Ability to Add Late witnesses
10/31/2024	1.0	Joan Mannix	Call with Peter Breen and Tyler Brooks re: last minute disclosures by defendant, potential remedies
10/31/2024	0.9	Nathan Loyd	Conduct meet and confer on possible settlement
10/31/2024	1.1	Nathan Loyd	Discuss meet and confer with Peter Breen and Tyler Brooks
10/31/2024	1.6	Nathan Loyd	Review and analyze new production from City
10/31/2024	1.4	Peter Breen	Review City's amended rule 26 disclosures including previously undisclosed witnesses on new topics; conference with Tyler Brooks & JMM to prepare regarding for meet & confer, including handling late-disclosed witness issue; attend meet & confer regarding settlement and late disclosed witnesses
10/31/2024	2.5	Peter Breen	Further conferences with Tyler Brooks and NL, and with Tyler Brooks and JMM, regarding strategy to respond and object to late-disclosed witnesses, including reopening discovery, barring witnesses or limiting their testimony, or striking late disclosure
10/31/2024	1.1	Peter Breen	Exchange correspondence with Michael McHale regarding reasonable rates for settlement demand requested by City, per order of court to engage in settlement negotiations; review D.Minn. caselaw provided by McHale on fees

10/31/2024	0.2	Tyler Brooks	Receive and Consider Court's Notice/Order Extending Deadlines; Reset Deadlines
10/31/2024	0.5	Tyler Brooks	Call with Peter Breen and Joan Mannix to Prepare for Meet and Confer
10/31/2024	1.2	Tyler Brooks	Prepare for and attend Meet and Confer with City's Counsel re: Settlement Possibilities and "Amended" Rule 26(a) Initial Disclosures
10/31/2024	1.5	Tyler Brooks	Confer with Peter Breen and Nathan Loyd re: Strategy for Objecting to "Amended" Rule 26(a) Disclosures
10/31/2024	3.7	Tyler Brooks	Work on Research and Letter to City Objecting to Late Disclosure of Witnesses
10/31/2024	1.1	Tyler Brooks	Confer with Peter Breen and Joan Mannix re: Strategy and Remedy to be Sought for Late Disclosures
11/4/2024	1.7	Tyler Brooks	Conduct Research re: Research Attorney Fee Rates for Demand Letter and Exchange Email Correspondence with Peter Breen, Joan Mannix, and Nathan Loyd re: Same
11/4/2024	3.7	Tyler Brooks	Work on Drafting Required Demand Letter, Including Review and Analysis of Work Performed by Counsel, Consideration of Reasonable Rates and Hours, and Justifications therefor
11/4/2024	0.4	Peter Breen	Exchange correspondence with cocounsel regarding reasonable rates
11/5/2024	0.4	Peter Breen	Exchange correspondence with local counsel regarding hours and rates
11/5/2024	2.5	Tyler Brooks	Revision Settlement Demand Letter per Feedback from Peter Breen and Joan Mannix
11/5/2024	1.5	Peter Breen	Review & revise settlement demand letter to City
11/5/2024	0.8	Peter Breen	Conf with Tyler Brooks regarding terms of settlement letter
11/5/2024	1.2	Tyler Brooks	Work on Key Revisions to Settlement Demand and Circulate Revised Version of Settlement Demand Letter Incorporating Changes from Peter Breen
11/5/2024	0.8	Tyler Brooks	Telephone Conference with Peter Breen re: Drafting of Terms for Settlement Demand Letter
11/7/2024	2.7	Tyler Brooks	Work on Letter Required to be Sent to Magistrate Judge Foster re: Settlement Conference
11/8/2024	0.1	Tyler Brooks	Telephone Conference with Peter Breen re: Draft Letter to Magistrate Judge Foster as to Settlement Conference with City
11/8/2024	1.3	Tyler Brooks	Work on Revisions to Required Letter to Magistrate Judge Foster re: Settlement Conference to Incorporate Changes Requested by Peter Breen; Circulate Same

11/8/2024	0.6	Tyler Brooks	Work on Finalizing Required Letter to Magistrate Judge Foster re: Settlement Conference and Email Same to Chambers per Court's Directions
11/11/2024	4.1	Nathan Loyd	Draft motion to compel production
11/12/2024	0.2	Tyler Brooks	Telephone Conference with Peter Breen re: Arguments Presented in Draft Motion to Compel
11/12/2024	1.0	Joan Mannix	Review/revise motion to compel
11/12/2024	3.9	Nathan Loyd	Continue drafting motion to compel production of purportedly privileged documents
11/12/2024	1.0	Nathan Loyd	Continue drafting motion to compel production of purportedly privileged documents
11/12/2024	2.3	Tyler Brooks	Work on Proposed Revisions and Make Comments on Draft Motion to Compel; Review and Comment re: Supporting Documents; Communicate with Peter Breen, Joan Mannix, and Nathan Loyd re: Comments
11/12/2024	2.1	Peter Breen	Significant revision and editing of memorandum in support of motion to compel, review of motion and supporting exhibit package
11/12/2024	0.5	Tyler Brooks	Research, Analyze, and Communicate with Nathan Loyd re: Documents Required for Arguments Made in Motion to Compel
11/13/2024	0.2	Tyler Brooks	Review Potential Dates for Mediation from Chambers and Exchange Email Correspondence with Counsel for the City Sara Lathrop re: Potential Dates for Mediation
11/14/2024	0.6	Tyler Brooks	Exchange Email Correspondence with Joan Mannix re: Prior Agreement with City re: Discovery Deadlines
11/14/2024	1.5	Joan Mannix	Start drafting motion to bar last minute disclosed witnesses including review of procedural history, prior disclosures, discovery orders
11/15/2024	0.4	Peter Breen	Respond to City's email implying Plaintiffs improperly handled clawed back documents and request specific support for allegations, conference with cocounsel regarding same
11/15/2024	0.2	Peter Breen	Exchange emails with cocounsel regarding preparing sealing motion
11/15/2024	0.1	Tyler Brooks	Exchange Email Correspondence with Counsel for the City Sara Lathrop Clarifying Issue re: Mediation
11/17/2024	0.4	Tyler Brooks	Exchange Email Correspondence with Joan Mannix re: Rule 26(a) Disclosures and Agreements with the City re: Discovery Deadlines
11/17/2024	1.0	Joan Mannix	Review depositions of defense witnesses

11/18/2024	0.2	Tyler Brooks	Exchange Email Correspondence with Joan Mannix re: Testimony of City's Witnesses in Deposition Transcripts
11/19/2024	0.3	Tyler Brooks	Follow Up Email Correspondence with Joan Mannix and Peter Breen re: Testimony of City's Witnesses at Deposition
11/22/2024	0.2	Tyler Brooks	Email Magistrate Judge Foster's Chambers re: Attendees at Zoom Hearing, per Court's Direction; Ask Leave for Paralegal to Appeal; Receive Permission for Same
11/23/2024	5.5	Nathan Loyd	Finalize arguments for production of purportedly privileged documents and produce summary document for Peter Breen
11/25/2024	0.2	Peter Breen	Review letter to Judge Foster regarding settlement conference, correspondence with cocounsel regarding same
11/25/2024	4.1	Peter Breen	Prepare regarding for hearing on motion to compel, review outline prepared by NL, review relevant caselaw, parties' arguments, revise and extend outline
11/26/2024	1.0	Nathan Loyd	Call with Peter Breen to discuss upcoming hearing on privilege waiver
11/26/2024	1.8	Tyler Brooks	Attend Motion to Compel Hearing and Take Notes on Arguments and Court's Ruling on Issues
11/26/2024	4.4	Peter Breen	Conf with Nathan Loyd regarding hearing on motion to compel, continue preparations for hearing & review of caselaw; present argument in support of motion to compel
11/26/2024	0.3	Tyler Brooks	Telephone Conference with Peter Breen re: Motion to Compel Hearing and Strategy for Implementing Court's Ruling
11/27/2024	0.5	Tyler Brooks	Receive and Review Latest Clawback Request from City; Email Peter Breen, Joan Mannix, and Nathan Loyd re: Same; Review and Analyze Court's Order re: Permissibility of Instant Clawback
11/27/2024	0.3	Peter Breen	Review new clawback from City post-hearing, correspondence with Tyler Brooks regarding same
12/2/2024	0.6	Tyler Brooks	Research and Analyze Possible Remedies re: Court's Order and Relief on Appeal; Communicate Same to Peter Breen, Joan Mannix, and Nathan Loyd
12/2/2024	0.8	Joan Mannix	Research re: last minute disclosures/remedies
12/6/2024	1.3	Tyler Brooks	Receive and Review Offers of Judgment and Analyze Legal Consequences of Acceptance or Rejection
12/9/2024	0.5	Tyler Brooks	Prepare for and Attend Conference with Counsel for the City Sara Lathrop and Tracey Fussy and Lead Plaintiffs' Counsel Peter Breen re: Offers of Judgment and Settlement

12/9/2024	0.7	Tyler Brooks	Work on Letter to City re: Consequences for Clients of Offer of Judgment; Circulate Same to Peter Breen; Joan Mannix, and Nathan Loyd
12/9/2024	0.2	Tyler Brooks	Email Brian Gibson of PLAM re: Offers of Judgment; Discuss Meeting
12/9/2024	0.8	Tyler Brooks	Telephone Conference with Peter Breen re: Offers of Judgment and Communications of Consequences of Offers to Clients
12/9/2024	0.3	Tyler Brooks	Receive and Analyze City's Latest Clawback Demand (dated 12/9) and Email Peter Breen, Joan Mannix, and Nathan Loyd re: Same
12/10/2024	0.5	Tyler Brooks	Prepare for and Attend Teams Meeting with Brian Gibson and Debra Braun of PLAM and Peter Breen re: Consequences of Offers of Judgment
12/10/2024	0.5	Tyler Brooks	Review Letter to City re: Consequences to Clients of Accepting Offers of Judgment; Receive and Analyze Email Response from Counsel for the City (Sara Lathrop)
12/10/2024	0.9	Tyler Brooks	Telephone Conference with Peter Breen re: Analysis of Legal Implications of City's Offers of Judgment; Protection of Clients' Future Rights
12/12/2024	0.4	Tyler Brooks	Draft and Send Further Email Correspondence to Clients re: Communication of City's Offer and Implications for Clients' Future Conduct
12/17/2024	0.8	Nathan Loyd	Legal research on accepting offer of judgement
12/18/2024	0.7	Tyler Brooks	Exchange Email Correspondence with Peter Breen and Nathan Loyd and Comment re: Draft Acceptance of Offer of Judgement and Manner of Service of Same